

**1st QUARTERLY PROGRESS REPORT
2nd Quarter 2021**

**PROTECO LANDFILL SITE
Peñuelas, Puerto Rico**

Report Date: July 15, 2021

Reporting Period: April 1 through June 30, 2021

This Quarterly Progress Report was prepared by *de maximis, inc.* on behalf of the PROTECO Site (Site) for the Proteco Landfill Generators Parties Group (Group), pursuant to Paragraph 34(a) of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (“Order”) and Section XIII, Task 12, of the Statement of Work (SOW) attached to the Order as Appendix C.

QUARTERLY PROGRESS REPORT ELEMENTS

The four (4) Quarterly Progress Report Elements, and their sub-elements, are defined in the SOW, Task 12 and are itemized below:

1. Summary of Settlement Agreement Compliance Actions Performed this Quarter

1.1 Installation of Signs and Access Barriers

On April 12 and 13 of 2021, Rightway Environmental, under the supervision of the Group’s consultant, Geosyntec, performed the installation of signs and access barriers at Site locations approved by the USEPA.

On Monday, April 12, 2021, Geosyntec and Rightway were accompanied by Zolyamar Luna of USEPA, Amarilis Rodriguez and Omar Santiago of PRDNER. Also, present onsite were Jorge García representing Checkpoint and Raúl Colón of Caribe Environmental, Checkpoint’s consultant.

Field activities began on April 12, 2021 with the shallow auger drilling and hand-excavation for the placement of signposts and anchor posts. The anchor posts were installed for the traffic-control plastic drums held in place with a cable connected to the posts. The work was completed on April 13, 2021.

During a Site visit on June 24, 2021, it was discovered that one of the support poles at the site entrance near Waste Unit 8 had been pushed over. Photographs of the signs and access barriers are attached to this report.

Cattle and horses were observed roaming the Site during the June 24th visit.

1.2 Site Clearing Plan

The Site Clearing Plan was submitted to EPA on May 24, 2021 for Agency review and approval. It was determined by EPA that DNER review of the plan was necessary prior to Agency approval to clear the Site of trees and vegetation. Clearing the Site of trees and vegetation are necessary for the Site survey task to be performed and completed. Clearing the site is also needed to effectively conduct a Site Reconnaissance Visit. EPA will advise the Group of any substantive permit requirements which might be required for compliance with EPA and/or DNER regulations.

The Group is awaiting Agency approval of the Site Clearing Plan and notes that it needs that approval to begin the clearing work. Approval of the Site Clearing Plan is needed as soon as possible to minimize additional vegetation growth and potential schedule delays due to storms during the upcoming rainy season. Approval to clear site vegetation is also important in order to accommodate the current deadline of September 1 for the Site Reconnaissance Visit.

1.3 Determination of Site Boundaries

A licensed Puerto Rico surveyor was retained by the Group to search public records and attempt to find legal boundaries for the Site. The Group also contacted the landowner's attorney in an attempt to determine the availability of any registered Site plans and to improve the Group's understanding of the Site boundaries. The determination of Site legal boundaries task was continuing at the end of the reporting period.

1.4 Extension of Project Schedule by EPA

On May 26, 2021, the Group requested a ninety (90) day extension for completion of the Site Reconnaissance Visit. EPA granted the 90-day extension on June 2, 2021, making September 1, 2021 the new deadline for completion of this task.

2. Summary of sampling and tests performed at the Site by the Respondents this Quarter

No media sampling or laboratory testing was performed by the Group during this quarter.

3. Summary of Work and Schedule Planned for Next Quarter (July through September 2021)

3.1 Work Planned

- 3.1.1 Establish a preliminary Site legal boundary based upon existing information and Site plans.
- 3.1.2 Begin Site clearing work once the Group receives EPA approval of Site Clearing Plan.
- 3.1.3 Mobilize Surveyor once sufficient clearing of Site vegetation has been performed to allow the surveyor to locate the waste units and preliminary Site boundaries.
- 3.1.4 Determine Site stormwater and erosion controls necessary to minimize impacts from tree and vegetation cutting.
- 3.1.5 Schedule Site Reconnaissance Visit.

3.2 Schedule for Planned Work

Work schedule is dependent upon EPA approval of Site Clearing Plan. A simplified Gantt chart schedule is attached to this report as a reference.

3.3 Impact of Planned Work on RI/FS Completion Schedule

Clearing the Site of vegetation and performing the surveys to locate former waste disposal units and the Site boundaries will allow the Group to schedule the Site Reconnaissance Visit. The date of the Site Reconnaissance Visit is the first major milestone in the RI/FS process with all subsequent activities, meetings and deliverables measured from that date in the schedule.

4. **Summary of Problems, Delays and Solutions**

4.1 Problems Encountered During this Quarter

- 4.1.1 Presence of a trespasser and his cattle and horses at the Proteco Site. The attorney for the landowner verbally confirmed to the Group that no lease, or grazing rights agreement, exists between the landowner and the owner of the livestock.
- 4.1.2 The requirement to prepare and submit a Site Clearing Plan for EPA and DNER approval.
- 4.1.3 There are no public land records which contain any survey data or specific location information regarding the Proteco Site legal boundaries.

4.2 Anticipated or Potential Problems Next Quarter

- 4.2.1 Defining the legal Site boundaries and how those boundaries meet with the two (2) current and active landfill operations adjacent to the Proteco Site.
- 4.2.2 Uncertainty of EPA and DNER direction on permit requirements for Site clearing, if any.

4.3 Schedule Delays Encountered This Quarter

- 4.3.1 Removing the trespasser and his cattle and horses before the installation of signage and access barriers.
- 4.3.2 Preparing the Site Clearing Plan delayed the necessary Site clearing activities and Site survey task. These delays also resulted in the need for an extension of the deadline for conducting the Site Reconnaissance visit, which is currently scheduled for September 1, 2021.

4.4 Anticipated or Potential Schedule Delays Next Quarter

- 4.4.1 The Group anticipates needing additional time beyond September 1, 2021 to perform the Site Reconnaissance Visit. The Group anticipates that it will take approximately forty-four (44) working days to clear the Site, assuming no unexpected setbacks.

4.5 Solutions Implemented to Address Actual Problems or Schedule Delays This Quarter

4.5.1 The Group requested and received a 90-day extension to the project schedule.

4.6 Solutions Planned to Address Anticipated Problems or Schedule Delays Next Quarter

4.6.1 As the Site Clearing Plan remains under Agency review, an additional extension to the Project Schedule is anticipated to allow for sufficient time to finalize and implement the Site Clearing Plan prior to completion of the Site Reconnaissance.

ATTACHMENT A

PHOTOGRAPHS

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**PROTECO LANDFILL SITE
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View of Signage at South Boundary of the Site



View of Signage at Northwest Boundary of the Site



View of Signage and Barricades at East Boundary of the Site with Ecosystems Landfill (looking southwest)



View of Signage and Barricades at East Boundary of the Site with Ecosystems Landfill (looking east)



April 2021: View of Signage and Barricades at Site Entrance near Waste Unit 8



June 2021: View of Signage and Barricades at Site Entrance near Waste Unit 8.
Note that the left support post has been pushed over since April 2021.

ATTACHMENT B

PRELIMINARY SCHEDULE

1st QUARTERLY PROGRESS REPORT
2nd Quarter 2021

PROTECO LANDFILL SITE
Peñuelas, Puerto Rico

DRAFT FOR PLANNING PURPOSES

ID	Task Name	Duration	Half 1, 2021		Half 2, 2021			Half 1, 2022			Half 2, 2022			Half 1, 2023			Half 2, 2023			Half 1, 2024			Half 2, 2024			Half 1, 2025			Half 2, 2025			Half 1, 2026			Half 2, 2026			Half 1, 2027			Half 2, 2027		
			J	M	M	J	S	N	J	M	M	J	S	N	J	M	M	J	S	N	J	M	M	J	S	N	J	M	M	J	S	N	J	M	M	J	S	N	J	M	M	J	S
1	PROJECT DURATION	2446 days	[Timeline bar from start to end]																																								
2	Task 1: RI/FS Scoping and Planning	90 days	[Timeline bar from start to start of Task 2]																																								
3	Site Reconnaissance (currently extended to 9/1/2021)	0 days	[Milestone diamond at start of Task 1]																																								
4	RI/FS Scoping and Planning Technical Memo (w/in 60 calendar days of Site Reconnaissance)	60 days	[Task bar starting at start of Task 1]																																								
5	Submit RI/FS SPTM	0 days	[Milestone diamond at end of Task 4]																																								
6	Technical Meeting 1 - RI/FS Work Plan Pre-Submittal (w/in 30 calendar days after submitting SPTM)	0 days	[Milestone diamond at end of Task 5]																																								
7	Task 2: RI/FS Work Plan: Field Sampling Plan, QAPP, H&S Plan and Cultural Resources Survey	210 days	[Task bar starting at end of Task 1]																																								
17	Task 4: Site Characterization	262 days	[Task bar starting at end of Task 2]																																								
29	Task 5: RI/FS Work Plan Addendum*	271 days	[Task bar starting at end of Task 4]																																								
43	Task 6: Implementation of the RI/FS Work Plan Addendum*	150 days	[Task bar starting at end of Task 5]																																								
56	Task 7: Identification of Candidates Technologies	90 days	[Task bar starting at end of Task 6]																																								
61	Task 8: Treatability Studies	444 days	[Task bar starting at end of Task 7]																																								
83	Task 9: Baseline Risk Assessment	874 days	[Task bar starting at end of Task 8]																																								
157	Task 10: Remedial Investigation Report	195 days	[Task bar starting at end of Task 9]																																								
168	Task 11: Feasibility Study: Development And Screening of Remedial Alternatives	90 days	[Task bar starting at end of Task 10]																																								
171	Task 12: Quarterly Progress Report & Meetings	1645 days	[Task bar starting at start of project]																																								
207	Task 13: Feasibility Study Report	165 days	[Task bar starting at end of Task 11]																																								

PROTECO PROJECT SCHEDULE (DRAFT) June 2021 *To be requested by EPA if necessary.	Task		Project Summary		Manual Task		Start-only		Deadline	
	Split		Inactive Task		Duration-only		Finish-only		Progress	
	Milestone		Inactive Milestone		Manual Summary Rollup		External Tasks		Manual Progress	
	Summary		Inactive Summary		Manual Summary		External Milestone			